

United States Court

District of Oregon

3:19-cv-00870-SI

Jason Paul Schaefer, | CIVIL ACTION
Plaintiff pro-se, | NO.

| *Jury Trial Demand*

- V -

Donald Trump, | CIVIL RIGHTS
Defendant. | COMPLAINT

I. Jurisdiction

1. The parties in this case reside in different States, and the amount in controversy exceeds 75,000 dollars, so these courts have jurisdiction. These courts may also have jurisdiction under "Bivens".

II. Parties

2. Jason Paul Schaefer - The Plaintiff, currently in the custody of the Attorney General
Mailing Address - Jason Schaefer 806826, 11540 N.E.
Inverness Dr., Portland, Oregon 97220

3. Defendant Donald Trump is currently the President of the United States, and lives in Washington D.C.

III. Facts

4. In July of 2017, Plaintiff Schaefer created an account on the Social Media Platform "Twitter" as "Clandestine Chemist".

5. Plaintiff decorated the account and its "About Me" Section with information about the Addiction-treatment drug Ibogaine Hydrochloride, and its pharmaceutical Name, "Endabuse".

6. Plaintiff Schaefer created this Social Media Account with the expectation and intentions of expressing himself and meeting and communicating with other people who had similar interests.

7. Plaintiff Schaefer had also intended to attract awareness to the addiction-treatment drug Ibogaine, and as a vehicle to seek redress from the government, and petition the government.

8. Ibogaine and the plant "Tabernanthe Iboga" are frequently used as Sacraments in the African Bwiti Religion, and in Shamanic Religious ceremonies.

9. Plaintiff Schaefer has traveled the world to participate in Shamanic Religious Ceremonies and is

a devout practitioner.

10. Plaintiff Schaefer had expected and intended to meet other Shamanic religious practitioners on Twitter and have discussions about Ibogaine and Iboga, and about religious retreats.

11. Plaintiff Schaefer was reviewing the public account of Defendant Donald Trump, "@realDonaldTrump", and posted some information on it about Ibogaine and its scientifically proven medical use in treating Opioid Addiction.

12. Plaintiff Schaefer had hoped that President Defendant Trump would be relieved to learn of this cure-drug which could turn the tide of the "Opioid epidemic", and would promote its use.

13. Instead, Defendant Trump "flagged" the plaintiff's Social Media account and had it completely removed from Twitter.

14. Defendant Trump could have simply "Blocked" the plaintiff's account so that the plaintiff could not message him anymore, but instead, he had the account completely removed from Twitter.

15. Plaintiff Schaefer was extremely upset and distraught and as a result of Defendant's Actions, never used Twitter again.

16. Plaintiff Schaefer received an email which stated "@real donald Trump has flagged your Account for removal".

II. Legal Claims

17. Defendant Trump chilled and obstructed Plaintiff Schaefer's religious exercise, his Speech, his right to peaceably assemble, and to petition the government for redress when he stripped the Plaintiff of his social media account. This caused the Plaintiff embarrassment, fear, mental anguish, and extreme emotional distress. It also violated Due Process of Law.

III. PRAYER FOR RELIEF

18. Plaintiff Schaefer prays for the following relief from the Defendant:

- a. Compensatory Damages..... \$500,000.00
- b. Punitive Damages..... \$2,000,000.00
- c. Declaratory Relief and the costs of this suit
- d. Any other relief deemed fit by the trier of fact, possibly including Clemency
- e. A trial by jury on all counts.

19. The plaintiff hereby certifies that the information is true and correct upon penalty of perjury, this May 27th, 2019

5/27/19

Jason Schaefer

